

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS

NAT'L HBPA, et al.,
Plaintiff

§
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§
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§
§

v.

Case No. 5:21-CV-071-H

JERRY BLACK, et al.,
Defendant

§
§
§
§

APPLICATION FOR ADMISSION *PRO HAC VICE*

(Complete all questions; indicate "N/A" if necessary.)

I. Applicant is an attorney and a member of the law firm of (or practices under the name of)
Liberty Justice Center, with offices at

141 W. Jackson Blvd., Ste. 1065
(Street Address)

Chicago
(City) IL
(State) 60604
(Zip Code)

312-637-2280
(Telephone No.) 312-263-7702
(Fax No.)

II. Applicant will sign all filings with the name Daniel R. Suhr.

III. Applicant has been retained personally or as a member of the above-named firm by:

(List All Parties Represented)

See attached list of parties

to provide legal representation in connection with the above-styled matter now pending before the United States District Court for the Northern District of Texas.

IV. Applicant is a member in good standing of the bar of the highest court of the state of Wisconsin, where Applicant regularly practices law.

For Court Use Only.
Bar Status Verified:

Bar license number: 1056658 Admission date: May 19, 2008

Attach to this application an original certificate of good standing issued within the past 90 days from the attorney licensing authority in a state in which you are admitted to practice (e.g., State Bar of Texas).

V. Applicant has also been admitted to practice before the following courts:

Court: _____ Admission Date: _____ Active or Inactive: _____

See attached list of admissions _____

VI. Applicant has never involuntarily lost, temporarily or permanently, the right to practice before any court or tribunal, or resigned in lieu of discipline, except as provided below:

N/A

VII. Applicant has never been subject to grievance proceedings or involuntary removal proceedings—regardless of outcome—while a member of the bar of any state or federal court or tribunal that requires admission to practice, except as provided below:

N/A

VIII. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses):

N/A

IX. Applicant has filed for *pro hac vice* admission in the United States District Court for the Northern District of Texas during the past three (3) years in the following matters:

Date of Application: Case No. And Style:

N/A _____

(If necessary, attach statement of additional applications.)

X. Local counsel of record associated with Applicant in this matter is

Fernando M. Bustos (Bustos Law Firm, P.C.), who has offices at
1001 Main Street, Suite 501
(Street Address)

Lubbock TX 79408
(City) (State) (Zip Code)

806-780-3976
(Telephone No.)

(Facsimile No.)

XI. Check the appropriate box below.

For Application in a **Civil Case**

Applicant has read *Dondi Properties Corp. v. Commerce Savs. & Loan Ass'n*, 121 F.R.D.284 (N.D. Tex. 1988) (en banc), and the local civil rules of this court and will comply with the standards of practice adopted in *Dondi* and with the local civil rules.

For Application in a **Criminal Case**

Applicant has read and will comply with the local criminal rules of this court.

XII. Applicant respectfully requests to be admitted to practice in the United States District Court for the Northern District of Texas for this cause only. Applicant certifies that a true and correct copy of this document has been served upon each attorney of record and the original upon the clerk of court, accompanied by a \$100 filing fee, on this the 14th day of January, 2022.

Daniel R. Suhr
Printed Name of Applicant

Signature

If the applicant files this document through the applicant's electronic-filing account, the applicant's typed name on the signature block constitutes the applicant's signature. If the applicant does not file this document through the applicant's electronic-filing account, the applicant must sign on the signature line.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

NATIONAL HORSEMEN'S BENEVOLENT AND
PROTECTIVE ASSOCIATION, ARIZONA HORSEMEN'S
BENEVOLENT AND PROTECTIVE ASSOCIATION,
ARKANSAS HORSEMEN'S BENEVOLENT AND
PROTECTIVE ASSOCIATION, INDIANA HORSEMEN'S
BENEVOLENT AND PROTECTIVE ASSOCIATION,
ILLINOIS HORSEMEN'S BENEVOLENT AND
PROTECTIVE ASSOCIATION, LOUISIANA HORSEMEN'S
BENEVOLENT AND PROTECTIVE ASSOCIATION,
MOUNTAINEER PARK HORSEMEN'S BENEVOLENT AND
PROTECTIVE ASSOCIATION, NEBRASKA HORSEMEN'S
BENEVOLENT AND PROTECTIVE ASSOCIATION,
OKLAHOMA HORSEMEN'S BENEVOLENT AND
PROTECTIVE ASSOCIATION, OREGON HORSEMEN'S
BENEVOLENT AND PROTECTIVE ASSOCIATION,
PENNSYLVANIA HORSEMEN'S BENEVOLENT AND
PROTECTIVE ASSOCIATION, TAMPA BAY HORSEMEN'S
BENEVOLENT AND PROTECTIVE ASSOCIATION, and
WASHINGTON HORSEMEN'S BENEVOLENT AND
PROTECTIVE ASSOCIATION,

No. 5:21-cv-00071-H

**ADDITIONAL
DOCUMENTATION IN
SUPPORT OF
APPLICATION FOR
ADMISSION *PRO HAC
VICE***

Plaintiffs,

v.

JERRY BLACK; KATRINA ADAMS; LEONARD COLEMAN,
JR.; NANCY COX; JOSEPH DUNFORD; FRANK KEATING;
KENNETH SCHANZER; the HORSERACING INTEGRITY
AND SAFETY AUTHORITY, INC.; the FEDERAL TRADE
COMMISSION; REBECCA KELLY SLAUGHTER, in her
official capacity as Acting Chair of the Federal Trade
Commission; ROHIT CHOPRA, in his official capacity as
Commissioner of the Federal Trade Commission; NOAH
JOSHUA PHILLIPS, in his official capacity as Commissioner of
the Federal Trade Commission; and CHRISTINE S. WILSON, in
her official capacity as Commissioner of the Federal Trade
Commission,

Defendants.

III. Applicant has been retained personally or as a member of the above-named firm by:

NATIONAL HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION,
 ARIZONA HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION,
 ARKANSAS HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION,
 INDIANA HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION,
 ILLINOIS HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION,
 LOUISIANA HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION,
 MOUNTAINEER PARK HORSEMEN'S BENEVOLENT AND PROTECTIVE
 ASSOCIATION,
 NEBRASKA HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION,
 OKLAHOMA HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION,
 OREGON HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION,
 PENNSYLVANIA HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION,
 TAMPA BAY HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, and
 WASHINGTON HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION,

to provide legal representation in connective with the above-styled matter now pending before the United States District Court for the Northern District of Texas.

V. Applicant has also been admitted to practice before the following courts:

Court:	Admission Date:	Active or Inactive:
U.S. Supreme Court	April 29, 2019	Active
U.S. Ct. of Appeals, 1 st Cir.	October 8, 2020	Active
U.S. Ct. of Appeals, 2 nd Cir.	Nov. 19, 2020	Active
U.S. Ct. of Appeals, 3 rd Cir.	April 9, 2019	Active
U.S. Ct. of Appeals, 4 th Cir.	August 26, 2021	Active
U.S. Ct. of Appeals, 5 th Cir.	November 9, 2021	Active
U.S. Ct. of Appeals, 7 th Cir.	February 9, 2012	Active

U.S. Ct. of Appeals, 8 th Cir.	Feb. 16, 2020	Active
U.S. Ct. of Appeals, 9 th Cir.	January 7, 2020	Active
USDC, Western D. of Wisconsin	April 9, 2019	Active
USDC, Eastern D. of Wisconsin	May 6, 2019	Active
USDC, Northern D. of Illinois	May 3, 2019	Active
Wisconsin Supreme Court	May 19, 2008	Active

Respectfully submitted,

/s/ Daniel R. Suhr



Sheila T. Reiff
Clerk

WISCONSIN SUPREME COURT

OFFICE OF THE CLERK

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P.O. Box 1688
Madison, WI 53701-1688

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CERTIFICATE OF GOOD STANDING

I, Christopher J. Paulsen, Chief Deputy Clerk of the Supreme Court of Wisconsin
certify that the records of this office show that:

DANIEL R. SUHR

was admitted to practice as an attorney within this state on May 19, 2008 and is
presently in good standing in this court.

Dated: December 8, 2021

A handwritten signature of Christopher J. Paulsen in black ink.

CHRISTOPHER J. PAULSEN
Chief Deputy Clerk of Supreme Court

